

William X Neitzche
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

FILED 18 JAN 19 16:19 USDC-ORP

**William X Neitzche (solely as trustee for
KRME International Trust),**

Et al.,

3:18-CV-01930-SI

Plaintiff/Petitioner,

Case No.

**DECLARATION IN SUPPORT
OF PLAINTIFF'S MOTION
FOR EXTENSION OF TIME**

v.

FREEDOM HOME MORTGAGE CORPORATION (FHMC),

Et al.,

Defendant(s)/Respondent(s)

**DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION FOR EXTENSION OF
TIME**


1. I am Julie Metcalf Kinney.
2. I am of sui juris and have personal knowledge of the facts attested herein.
3. Pauline Kinney is mother/mother-in-law/grandmother to Plaintiffs.
4. On or about December 23, 2018, Pauline Kinney was hospitalized and diagnosed with acute kidney failure and slight dementia.
5. Doctors have determined a (6) month life expectancy for Pauline Kinney.
6. Pauline Kinney is 89 years old and has been placed on hospice.

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7. Plaintiffs are under extreme duress due to the recent circumstances surrounding Pauline Kinney.
8. On December 31, 2018, I had a securitization audit conducted regarding the May 2002 mortgage/transaction.
9. On December 31, 2018, I discovered new-found evidence directly relating to Freedom Home Mortgage Corporation that can potentially expose FHMC to either civil or criminal liability or both.
10. At this time Plaintiffs have yet to ascertain the potential claims to bring against Defendant FHMC.
11. This is a lis pendens in this matter whereby Plaintiffs' intend on amending their complaint and joining certain agents acting on behalf of FHMC to this action, for claims, including but not limited to: a) Federal Constitutional 5th Amendment Due Process violations; b) Fraudulent Conveyance; and c) Constructive Trust.
12. This is a lis pendens in this matter whereby Plaintiffs' intend on amending their complaint and joining Mark K. Passanante, Roman Ozeruga and Terrance Slominski to this action, for claims, including but not limited to: a) Federal Constitutional 5th Amendment Due Process violations; b) Title 18 USC § 241 violations; c) Title 18 USC § 242 violations; d) Title 18 USC §1621 violations; and c) Constructive Trust.
13. Plaintiffs intend on amending its complaint to correct said procedural defects relating to the transferring of both Deed of Trusts in this matter by presenting competent evidence of its interest in said real property;
14. As well as retain and/or consult qualified legal counsel to potentially represent Plaintiffs' trust by an attorney in fact.

I DECLARE the abovesaid to be true and correct.

RESPECTFULLY DATED this 18th day of January, 2019.

By 
Julie Ann Metcalf Kinney
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]